

05-14-10

To Whom It May Concern:

I have been a career professional airline pilot for many years. I have held most all positions in transport aircraft such as Flight Engineer, First Officer, and Captain. The last position I have held in the airline industry was Captain on the Canadair Regional Jet. I have many years of experience on this particular aircraft. I was a First Officer with Comair Delta Connection for roughly five years and also a Captain with another Regional Airlines for just over two years. I have always been conscientious of the safety concerns of the passengers and fellow crewmembers that travel aboard my aircraft. It is the job and duty of a professional airline pilot and flight attendant to look out for the safety of their passengers as well as report any potential safety concerns that may exist. Safety concerns are not limited by the time the door is opened or closed on the aircraft. It is a duty around the clock while you are in uniform and when you are out in the general populace. Potential safety concerns as well as violations should not be ignored but reported to the appropriate staff in order for adjustments to be made. I am notifying you now of a passenger and crewmember safety issue that must not go unnoticed any longer. If we allow it to go on any further we fail those who depend on us to keep them out of harms way on a day to day basis.

The major safety concern that I would like to discuss is the height of the cabin entry door on the Canadair Regional Jet and the entire Regional Jet family alike. The typical "regional jet" door plan height is significantly shorter than the larger transport aircraft used today such as a Boeing 737 or Airbus 320. The height of the Regional Jet is short enough it poses an ongoing potential safety hazard for someone injuring their head during the boarding and de-boarding process.

In the seven years of working on this aircraft, I have witnessed numerous passengers strike their heads on the overhead portion of the entryway. Injuries have happened during the both periods during boarding and the de-boarding process when the passengers are the most anxious to get either on or off of a cramped stuffy aircraft. I have personally warned thousands of passengers as I stood to greet them, to "watch your head" only to later see them strike the door frame. I have witnessed Flight Attendants over and over again tell passengers to watch their heads only to have them strike it seconds later followed many times by having to use the first-aid kit.

The concerning problem of the door frame is that it is a rigid piece of metal and that over time can get wear and tear from door closure causing it to become even a greater potentially lethal contributor to an injury. The position of the boarding ramp that is placed in the door of the regional jet during entry or exit plays a role in the height of the entrance as well. If a gate agent puts the ramp too far into the door with the jet bridge too high, then the potential for striking your head on the upper door frame increases significantly.

The number of regional jets that are flying for the mainline service carriers are more than doubled what they were ten years ago. The chance of a passenger flying on an air carrier now days and not getting a connection on a regional jet is virtually none. This should be even more concerning due to the frequency of exposure to this problem. There is a need for the FAA to implement the protective device to this potential threat while passengers are being loaded and unloaded on all regional and commercial jets flying for CFR part 121 passenger carriers. Take one week and have your officials do a simple study to observe the passengers board and de-board while taking note of who “ducks” their head while passing through the door and how many people actually hit the overhead. Chances are the study need not be done since many FAA officials have hit and they will verify they have witnessed injury to other passengers from the entranceway.

Typically human instincts will protect ones self during the loading and off loading process but the many distractions cause the passengers to strike the overhead of the entryway time and time again especially if you are taller than average. If the Flight Attendant says: “Have a nice day” and one turns their head to respond then the threat is there, if the Flight Attendant says: “Welcome Aboard or Watch Your Head” passengers look up just in time to hit their head every time. Placement of the jet-bridge ramp, the narrow/steep steps and the physical rush to get on or off is a cause that we can’t fix but we can create a solution by utilizing the head guard device.

Changing the actual door height dimensions is not a practical or economic solution to the problem. However, a head guard protective device should be installed above the door during the boarding and de-boarding process. The device should be of a design that covers the top metal edge of the entrance that is constructed of a soft-forgiving material. One such device should be easily installed before boarding and before de-boarding with minimal process. Each individual aircraft should carry its own protective apparatus or have one readily accessible at each and every gate throughout the nation due to the capability of most regional jets having remote boarding potential by door stairs and a hazardous risk to passengers.

It is an absolute necessity that all of the regional jets that are flying today have the latest in safety features to protect the passengers that fly on them. A door frame protective device should be no exception. In the years of aviation, several safety devices have been invented and regulated after injury or catastrophe has occurred. It is time for the FAA, Regional Airlines, OSHA, FAA's Aviation Safety Action Program and Insurance companies to take a proactive stance on aviation safety and to start looking forward at what can be done to prevent not just the big accidents but the small ones too. It is just a matter of time before a passenger tries to hold the airline, FAA, aircraft manufacturers, or the insurance companies liable for an injury with the overhead of the door frame.

The safety of passengers and crew on an airplane are number one. This is not limited to just riding in a seat during a flight. A safety hazard exists during the boarding and de-boarding process. It has been my recommendation that something be done by the FAA and all commercial airlines to protect the passengers who use the regional jet service.

I believe that the head guard protective device should be installed in the upper main door frame on every regional jet before someone else gets hurt during ingress and egress. The protective device should be a required piece of equipment that is carried aboard all regional jet aircraft or readily accessible at every gate for every gate agent. Any delay by not using the head guard device is one more day of more passengers getting injured and we fail at "PASSENGER SAFETY".

If you have any questions about this safety awareness topic or like to discuss this matter in further detail, please feel free to contact me.

Safety is number one,

James F. Whisnant
Former Captain, Regional Airlines.